

EXHIBIT A

Warren, Previn

From: Oliver, Lance
Sent: Friday, May 16, 2025 5:13 PM
To: Dolan, Madeleine; Kouba, Annie
Cc: Chaput, Isaac; TikTokNoticeofService@faegredrinker.com; MetaNoticeofService; Warren, Previn; Colombo, Jessica; Lawrimore, Kathryn 'Katy'; MDL3047_PIBellwethers; Defendants-MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M; Micah Hobbs; Halperin, Gregory; Geri Howell; Egli, Megan (SHB); SOCIALMEDIAPI@SKADDENLISTS.COM
Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

Counsel,

As a courtesy, I'm letting you know that we'll probably be sending you this document – signed by N.K. – on Monday.

We have reviewed and prepared it with our client and are simply waiting on a signature. I don't think anyone should wait up or worry about getting it tonight.

When I do get a signed version, I'll send it to you.

Best,
Lance



Lance Oliver (he / him)
Attorney at Law

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o. 843.216.9061 f. 843.216.9450
loliver@motleyrice.com

From: Dolan, Madeleine <MDolan@cov.com>
Sent: Friday, May 9, 2025 1:38 PM
To: Oliver, Lance <loliver@motleyrice.com>; Kouba, Annie <akouba@motleyrice.com>
Cc: Chaput, Isaac <IChaput@cov.com>; TikTokNoticeofService@faegredrinker.com; MetaNoticeofService <MetaNoticeofService@cov.com>; Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; Defendants-MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Micah Hobbs <MHOBBS@shb.com>; Halperin, Gregory <GHalperin@cov.com>; Geri Howell <GHOWELL@shb.com>; Egli, Megan (SHB) <megli@shb.com>; SOCIALMEDIAPI@SKADDENLISTS.COM
Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

CAUTION:EXTERNAL

See attached.

From: Oliver, Lance <loliver@motleyrice.com>
Sent: Thursday, May 8, 2025 8:41 AM
To: Dolan, Madeleine <MDolan@cov.com>; Kouba, Annie <akouba@motleyrice.com>

Cc: Chaput, Isaac <IChaput@cov.com>; TikTokNoticeofService@faegredrinker.com; MetaNoticeofService <MetaNoticeofService@cov.com>; Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; Defendants-MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Micah Hobbs <MHOBBS@shb.com>; Halperin, Gregory <GHalperin@cov.com>; Geri Howell <GHOWELL@shb.com>; Egli, Megan (SHB) <megli@shb.com>; SOCIALMEDIAPI@SKADDENLISTS.COM
Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

[EXTERNAL]

Can you please send us a copy of this in Word? Thank you.



Lance Oliver (he / him)
 Attorney at Law

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From: Dolan, Madeleine <MDolan@cov.com>
Sent: Thursday, May 8, 2025 12:11 AM
To: Kouba, Annie <akouba@motleyrice.com>; Oliver, Lance <loliver@motleyrice.com>
Cc: Chaput, Isaac <IChaput@cov.com>; TikTokNoticeofService@faegredrinker.com; MetaNoticeofService <MetaNoticeofService@cov.com>; Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; Defendants-MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Micah Hobbs <MHOBBS@shb.com>; Halperin, Gregory <GHalperin@cov.com>; Geri Howell <GHOWELL@shb.com>; Egli, Megan (SHB) <megli@shb.com>; SOCIALMEDIAPI@SKADDENLISTS.COM; Dolan, Madeleine <MDolan@cov.com>
Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

CAUTION:EXTERNAL

Lance, Annie,

Pursuant to your suggestion during the H2 conference on collection of S.K.'s ongoing treatment records, Defendants have prepared the attached set of questions for N.K. about that treatment. Defendants remain of the view that collecting records from S.K.'s current provider through a signed authorization would be the most efficient and least invasive path forward, but given your continued objection to that approach, we are open to first proceeding with the approach you suggested. As noted in the attachment, Defendants request sworn responses to the attached questions by May 16.

Best,
 Maddie Dolan

Madeleine Dolan

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 Washington, DC 20001-4956
 T: 202 662 5300 | C: 202 322 7078 | mdolan@cov.com
www.cov.com

COVINGTON

From: Kouba, Annie <akouba@motleyrice.com>
Sent: Wednesday, April 30, 2025 10:03 AM
To: Oliver, Lance <loliver@motleyrice.com>; Halperin, Gregory <GHalperin@cov.com>; Geri Howell <GHOWELL@shb.com>
Cc: Chaput, Isaac <IChaput@cov.com>; TikTokNoticeofService@faegredrinker.com; MetaNoticeofService <MetaNoticeofService@cov.com>; Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; Defendants-MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Micah Hobbs <MHOBBS@shb.com>; Dolan, Madeleine <MDolan@cov.com>
Subject: Re: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

[EXTERNAL]

5:00pm ET tonight works for me. Thanks.

Annie Kouba | Attorney at Law | Motley Rice LLC

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From: owner-mdl3047_pibellwethers@listserv.motleyrice.com <owner-mdl3047_pibellwethers@listserv.motleyrice.com> on behalf of Oliver, Lance <loliver@motleyrice.com>
Sent: Wednesday, April 30, 2025 9:40 AM
To: Halperin, Gregory <GHalperin@cov.com>; Geri Howell <GHOWELL@shb.com>
Cc: Kouba, Annie <akouba@motleyrice.com>; Chaput, Isaac <IChaput@cov.com>; TikTokNoticeofService@faegredrinker.com <TikTokNoticeofService@faegredrinker.com>; MetaNoticeofService <MetaNoticeofService@cov.com>; Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; Defendants-MDL3047JCCP5255@skaddenlists.com; Defendants-MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Micah Hobbs <MHOBBS@shb.com>; Dolan, Madeleine <MDolan@cov.com>
Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

I can talk at 5:00 ET tonight, but I don't know about Annie's availability and I think we need her involved in this discussion. Sorry it took me a bit. Was out of pocket.



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Attorney at Law

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-----Original Message-----

From: Halperin, Gregory <GHalperin@cov.com>

Sent: Wednesday, April 30, 2025 8:57 AM

To: Oliver, Lance <loliver@motleyrice.com>; Geri Howell <GHOWELL@shb.com>

Cc: Kouba, Annie <akouba@motleyrice.com>; Chaput, Isaac <Ichaput@cov.com>;

TikTokNoticeofService@faegredrinker.com; MetaNoticeofService <MetaNoticeofService@cov.com>;

Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>;

Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers

<MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; Defendants-

MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Micah Hobbs

<MHOBBS@shb.com>; Dolan, Madeleine <MDolan@cov.com>

Subject: Re: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

CAUTION:EXTERNAL

Lance,

I am following up on my note below.

Thanks,

Greg

Gregory L. Halperin

Covington & Burling LLP

The New York Times Building, 620 Eighth Avenue<x-apple-data-detectors://1/1>

New York, NY 10018-1405<x-apple-data-detectors://1/1>

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On Apr 29, 2025, at 6:07 AM, Halperin, Gregory <GHalperin@cov.com> wrote:

Lance,

Meta is available for an H2 tomorrow at 4 or from 5-8 ET. Please let us know if there is a time in that window that would work for Plaintiffs.

Best,
Greg

Gregory L. Halperin
Pronouns: He/Him/His

Covington & Burling LLP
The New York Times Building, 620 Eighth Avenue New York, NY 10018-1405 T +1 212 841 1166 |
gshalperin@cov.com <http://www.cov.com>

[image001.png]

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From: Oliver, Lance <loliver@motleyrice.com>
Sent: Tuesday, April 22, 2025 10:33 AM
To: Howell, Geri (SHB) <GHOWELL@shb.com>
Cc: Kouba, Annie <akouba@motleyrice.com>; Chaput, Isaac <IChaput@cov.com>;
TikTokNoticeofService@faegredrinker.com; MetaNoticeofService <MetaNoticeofService@cov.com>;
Warren, Previn <pwarren@motleyrice.com>; Colombo, Jessica <jcolombo@motleyrice.com>;
Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com>; MDL3047_PIBellwethers
<MDL3047_PIBELLWETHERS@listserv.motleyrice.com>; [defendants-](#)
MDL3047JCCP5255@skaddenlists.com; Simonsen, Ashley M <asimonsen@cov.com>; Halperin,
Gregory <GHalperin@cov.com>
Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

[EXTERNAL]

I'll talk to my team. This Friday is not going to work for me. Can we try next Wednesday please?

If we don't intend to introduce, review or otherwise receive the documents, why does your client need them?

If we do agree to get them, will you agree that we do not need to get them until she is at least either a) through with this round of treatment or b) until a little bit later, like the end of the year, a certain amount of time before the update deposition. Our goal is just to do this one time and one time only. So, for example, doing it "now" makes no sense. We are also just not going to do it "now" under any circumstance because it will interfere with our client's treatment and we aren't going to do that . . . and

neither are you without a Court order, I should add.

[image003.png]

Lance Oliver (he / him)
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From: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>
Sent: Tuesday, April 22, 2025 10:05 AM
To: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>
Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>; TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>; MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn <pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica <jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>

MDL3047JCCP5255@skaddenlists.com>; Ashley Simonsen

<asimonsen@cov.com<<mailto:asimonsen@cov.com>>>; Halperin, Gregory

<GHalperin@cov.com<<mailto:GHalperin@cov.com>>>

Subject: RE: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

CAUTION:EXTERNAL

Lance-

I have discussed your proposal with my client, which did not include permitting Defendants to collect Ms. Krekeler's current treatment records or, alternatively, Plaintiff providing those records to Defendants. Without Ms. Krekeler's treatment records, neither Meta, nor TikTok are in a position to agree to any proposals. During our April 10th conversation, you had promised to discuss further with your team to see if Plaintiff could agree to providing her ongoing treatment records to Defendants and/or permitting Defendants to collect those records with an authorization and get back to me. I have not heard from you or anyone from your team confirming that Plaintiff can or will agree to either solution for production of Ms. Krekeler's ongoing treatment records.

Unless you are now able to agree to production of Ms. Krekeler's ongoing treatment records either through production by Plaintiff, or through Defendants collecting those records with an authorization, we will need to schedule the H2 conference. Please advise of your team's availability for an H2 conference on Friday during the times proposed below.

Thanks,

Geri

From: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>

Sent: Monday, April 21, 2025 7:31 PM

To: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>

Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput <Ichaput@cov.com<<mailto:Ichaput@cov.com>>>;

TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>;

MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn

<pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica

<jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy'

<klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers

<MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>>; Ashley Simonsen

<asimonsen@cov.com<<mailto:asimonsen@cov.com>>>; Halperin, Gregory

<GHalperin@cov.com<<mailto:GHalperin@cov.com>>>

Subject: Re: Krekeler--Availability for H2 Conference Re: Collection of Sloane Krekeler's Ongoing Treatment Records

EXTERNAL

Geri,

I'm a bit surprised. Previously we had a single phone call. During that call we discussed a number of possibilities. All of which were directed at getting defendants updated material without interfering with our client's treatment, prematurely doing things that will have to be repeated, or requiring seriatim production of records while treatment is ongoing. None of this is efficient.

You were supposed to get back to us to discuss your clients reaction. Which you did not do. Instead you demand an H2. I understand that an H2 requires the parties to make efforts. But you've made no efforts. So an H2 simply is not ripe.

If I didn't know better I'd think you had literally done nothing, nothing at all, to suggest a reasonable accommodation for **a very sick young woman**. So I suggest prior to any H2 we talk and see if I can at least gain the privilege of your clients response to my offers. I'm still willing to get them what they need. It's hard for me to know the precise parameters right now given that treatment is ongoing.

So let's talk but an H2 over this small issue is disrespectful to the process as the whole and assumes that we cannot work out even the most basic issues. I just don't think that's true.

Best,
Lance

[image003.png]

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On Apr 21, 2025, at 5:49 PM, Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>> wrote:

CAUTION:EXTERNAL

Counsel-

Defendants would like to schedule an H2 conference this week to discuss the issue of collection of Sloane Krekeler's records for her ongoing treatment for her recent onset of active symptoms of her eating disorder. Please advise of your availability on the following times on Friday, April 25th:

1. 1:00-1:30 p.m. EDT;
2. 3:00-4:30 p.m. EDT; and/or
3. After 5:00 p.m. EDT.

Thanks,

Geri

From: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>>

Sent: Tuesday, April 8, 2025 1:41 PM

To: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>>; Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>>

Cc: Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>>;

TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>>;

MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>>; Warren, Previn

<pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>>; Colombo, Jessica

<jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>>; Lawrimore, Kathryn 'Katy'

<klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>>; MDL3047_PIBellwethers

<MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>>

Subject: RE: Sloane Krekeler - Update

Thanks for the quick responses, Lance and Annie. I will send around a calendar invitation momentarily.

From: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>

Sent: Tuesday, April 8, 2025 1:40 PM

To: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>; Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>

Cc: Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>;

TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>>;

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<jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy'

<klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers

<MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>

Subject: Re: Sloane Krekeler - Update

EXTERNAL

Yes, I am. I have a meet and confer with some of the folks on this list at 12pm Eastern, but don't think that will be a problem.

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<image001.png>

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Cc: Kouba, Annie <akouba@motleyrice.com<mailto:akouba@motleyrice.com>>; Isaac Chaput <IChaput@cov.com<mailto:IChaput@cov.com>>;
TikTokNoticeofService@faegredrinker.com<mailto:TikTokNoticeofService@faegredrinker.com>
<TikTokNoticeofService@faegredrinker.com<mailto:TikTokNoticeofService@faegredrinker.com>>;
MetaNoticeofService@cov.com<mailto:MetaNoticeofService@cov.com>
<MetaNoticeofService@cov.com<mailto:MetaNoticeofService@cov.com>>; Warren, Previn
<pwarren@motleyrice.com<mailto:pwarren@motleyrice.com>>; Colombo, Jessica
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<klawrimore@motleyrice.com<mailto:klawrimore@motleyrice.com>>; MDL3047_PIBellwethers
<MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>
<defendants-MDL3047JCCP5255@skaddenlists.com<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>
Subject: RE: Sloane Krekeler - Update

Oh sorry. Just me. Annie you available?

<image001.png>

Lance Oliver (he / him)
Attorney at Law

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o. 843.216.9061<<tel:843.216.9061>>

f. 843.216.9450

loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>

From: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>
Sent: Tuesday, April 8, 2025 1:37 PM
To: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>
Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput
<IChaput@cov.com<<mailto:IChaput@cov.com>>>;
TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>;
MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn
<pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica
<jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy'
<klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers

<MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>

Subject: RE: Sloane Krekeler - Update

CAUTION:EXTERNAL

Thanks, Lance. Are you responding for both Annie and yourself, or just yourself?

From: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>
Sent: Tuesday, April 8, 2025 12:11 PM
To: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>
Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>; TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>; MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn <pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica <jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>
Subject: RE: Sloane Krekeler - Update

EXTERNAL

It's okay here.

<image001.png>

Lance Oliver (he / him)
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28 Bridgeside Blvd., Mt. Pleasant, SC 29464

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From: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>
Sent: Tuesday, April 8, 2025 11:45 AM
To: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>
Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>; TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>; MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn <pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica <jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>>

MDL3047JCCP5255@skaddenlists.com>

Subject: RE: Sloane Krekeler - Update

CAUTION:EXTERNAL

Lance and Annie-

Defendants are available at 11:30 a.m. EDT on Thursday, 4/10 to listen to Plaintiff's proposal on the issue of collection of Ms. Krekeler's current treatment records and supplemental deposition. If this time works for the two of you, please confirm and I will send out a calendar invitation.

Thanks,

Geri

From: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>

Sent: Monday, April 7, 2025 4:11 PM

To: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>

Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>;

TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>;

MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn

<pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica

<jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy'

<klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers

<MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>

Subject: RE: Sloane Krekeler - Update

EXTERNAL

Annie will need to be available too.

I'm available tomorrow at 11-12 and after 4:30 eastern.

Wednesday morning I'm available. Thursday I'm available most of the day.

While I appreciate your deep need to jump to conclusions, I'm not saying we won't produce documents. I am saying we may be able to reach an agreement on that. Production of new documents may not be necessary depending on what we plan to say about the new treatment. We can talk about it when we have our call.

Best,

Lance

<image001.png>

Lance Oliver (he / him)
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From: Howell, Geri (SHB) <GHOWELL@shb.com<mailto:GHOWELL@shb.com>>
Sent: Friday, April 4, 2025 3:02 PM
To: Oliver, Lance <loliver@motleyrice.com<mailto:loliver@motleyrice.com>>
Cc: Kouba, Annie <akouba@motleyrice.com<mailto:akouba@motleyrice.com>>; Isaac Chaput <IChaput@cov.com<mailto:IChaput@cov.com>>; TikTokNoticeofService@faegredrinker.com<mailto:TikTokNoticeofService@faegredrinker.com>; MetaNoticeofService@cov.com<mailto:MetaNoticeofService@cov.com>; Warren, Previn <pwarren@motleyrice.com<mailto:pwarren@motleyrice.com>>; Colombo, Jessica <jcolombo@motleyrice.com<mailto:jcolombo@motleyrice.com>>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com<mailto:klawrimore@motleyrice.com>>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>
Subject: RE: Sloane Krekeler - Update

CAUTION:EXTERNAL

Lance-

Please let us know when you are available to confer. Obviously, Ms. Krekeler cannot pursue a claim for an eating disorder and related injuries while refusing to produce records regarding the same. If your

position is that you will not permit us to collect medical records related to Ms. Krekeler's alleged injuries, we will need to address with the Court.

Thanks,

Geri

From: Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>
Sent: Friday, April 4, 2025 10:41 AM
To: Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>
Cc: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>; Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>; TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>; MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>; Warren, Previn <pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica <jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>; MDL3047_PIBellwethers <MDL3047_PIBELLWETHERS@listserv.motleyrice.com<mailto:MDL3047_PIBELLWETHERS@listserv.motleyrice.com>>; defendants-MDL3047JCCP5255@skaddenlists.com<<mailto:defendants-MDL3047JCCP5255@skaddenlists.com>>
Subject: Re: Sloane Krekeler - Update

EXTERNAL

We're happy to talk. We are not providing documents right now. Until we agree on basic parameters. It's not clear how this info will even come up.

<image001.png>

Lance Oliver (he / him)
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On Apr 4, 2025, at 7:35 AM, Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>>
wrote:

CAUTION:EXTERNAL

Good morning, Annie-

We are sorry to hear that Sloane is experiencing another onset of active symptoms of her eating disorder. We wish her a successful and speedy recovery.

Please let us know the names and locations of the facilities and treaters involved in diagnosing and/or treating Sloane's recent onset of active symptoms of her eating disorder, so that we may use the previously provided blank authorizations to collect her treatment records.

While we are not in a position to substantively discuss a supplemental deposition of Sloane until we have more information, including records for her ongoing treatment, we are open to listening to any proposal that you may want to make. To that end, we are available on the following dates/times next week to listen:

1. Monday, 4/7 after 2:00 p.m. EDT;
2. Wednesday, 4/9, after 2:00 p.m. EDT; and
3. Thursday, 4/10, between 9:30 a.m. and 1:30 p.m. EDT.

Please let us know if one of these dates/times work. If not, please provide us with alternative proposed dates/times.

Thanks,

Geri

From: Kouba, Annie <akouba@motleyrice.com<<mailto:akouba@motleyrice.com>>>
Sent: Monday, March 31, 2025 5:56 PM
To: Isaac Chaput <IChaput@cov.com<<mailto:IChaput@cov.com>>>; Howell, Geri (SHB) <GHOWELL@shb.com<<mailto:GHOWELL@shb.com>>>; TikTokNoticeofService@faegredrinker.com<<mailto:TikTokNoticeofService@faegredrinker.com>>; MetaNoticeofService@cov.com<<mailto:MetaNoticeofService@cov.com>>
Cc: Warren, Previn <pwarren@motleyrice.com<<mailto:pwarren@motleyrice.com>>>; Colombo, Jessica <jcolombo@motleyrice.com<<mailto:jcolombo@motleyrice.com>>>; Oliver, Lance <loliver@motleyrice.com<<mailto:loliver@motleyrice.com>>>; Lawrimore, Kathryn 'Katy' <klawrimore@motleyrice.com<<mailto:klawrimore@motleyrice.com>>>
Subject: Sloane Krekeler - Update

EXTERNAL

Counsel,

We have recently been informed that our client, Sloane Krekeler, has unfortunately experienced another onset of active symptoms of her eating disorder.

We will remain available to discuss the situation with you all further. For now, Sloane is focusing on her recovery and finishing her last semester of high school, so will not be available to sit for additional deposition time, if warranted, any time in the near future.

In the meantime, we'd like to schedule a time to have a call with you all about the procedure and protocol for an update deposition, given this development. Please let me know your availability for times next week.

Best,

Annie

<image001.png>

Annie Kouba (she / her)
Attorney at Law

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